

06-2110

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

LINDA WILLIAMS,

Plaintiff,

VS.

ENTERPRISE CITY SCHOOL DISTRICT,

Defendant.

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CASE NO. 1:06CV598-WKW

**DEFENDANT'S CONSOLIDATED DISCOVERY REQUESTS**  
**TO THE PLAINTIFF**

Comes now the Defendant in the above-styled cause, and pursuant to the Federal Rules of Civil Procedure, requests that the Plaintiff answer and submit documents in response to the following:

## DIRECTIONS FOR ANSWERING INTERROGATORIES AND PRODUCING MATERIALS AND THINGS

Interrogatories are to be answered under oath within thirty (30) days from the date of service.

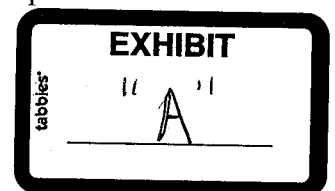
Materials to be produced for inspection and copying are to be produced at the offices of Marsh, Cotter & Stewart, 203 East Lee Street, Post Office Drawer 310910, Enterprise, Alabama 36330. Alternatively, you may send copies of the materials requested with the answers to the interrogatories.

Responses are be supplemented and additional documents and materials produced as the information and documents requested become available to you. This supplementation is required by the Federal Rules of Civil Procedure or other rules governing this Court.

## DEFINITIONS

This Defendants sets forth the following definitions of various words and phrases which are contained in the attached request for discovery. Defendants provides the following definitions for the purpose of clarifying the meaning of various words and phrases and contained therein in order to help the Plaintiff understand the objectives of these discovery efforts and to locate and furnish the relative information.

1. The term "you" or "yours" applies to Plaintiff, her agents, servants and representatives.



2. "Document" means the original or any copy of any written, recorded, transcribed, printed, or impressed matter of whatever kind, however produced, or reproduced, including, but not limited to, sound pictorial records, computerized information, books, pamphlets, letters, memoranda, telegrams, electronic or mechanical transmissions, communications of all kinds, reports, operating statements, working papers, handwritings, charts, writings, printings, transcriptions, tapes and records of all kinds.

3. "Describe" when used with respect to any oral communications or statements means to identify each and every person present or who engaged therein, and the substance of what was said; the date and time of such oral communications or statements; and where each person was when such oral communications or statements were made.

4. An interrogatory asking you to "state each and every fact upon which this contention is based" seeks the disclosure of each and every fact, circumstance, condition, anything known to you, your agent, servant, employee, or attorney as of the date the interrogatories are answered, full identification and description of the sources of such facts, circumstances, condition and things, including, but not limited to, identification and description of each document relating to or referring to such fact, circumstance, condition or thing; and identification of each person having knowledge of such fact, circumstance, condition or thing.

### **INTERROGATORIES**

1. State the name of every witness you expect to call at the trial of this cause, and for each, please state their home address and telephone number.

2. Please state the name of every expert witness you intend to call at the trial of this cause, and for each, please state the following:

- (a) the area of expertise in which the expert is expected to testify;
- (b) the qualifications of said expert in detail;
- (c) the residence and business address of said expert;
- (d) the conclusions and opinions which said expert is expected to give and the facts

upon which said expert basis his/her opinions and conclusions

3. State the name and address of any medical provider (all doctors, hospitals, clinics, dentists, chiropractors, psychologist/psychiatrists, etc.) you have consulted in the last ten years to the present and the reason you consulted said medical provider.

**REQUEST FOR PRODUCTION**

1. Please identify and produce any and all tangible items gathered or retained as a result of the incident made the basis of your lawsuit.
2. Identify and produce a copy of each and every communication between you and this defendant and this defendant's agent, employee or servant related in any manner to your claims set forth in your complaint.
3. Identify and produce any and all reports of experts you have retained for the prosecution of this case.
4. Identify and produce a copy of each and every document requested by you from a third party, including, but not limited to, information requested in subpoenas in the prosecution of this case.
5. Identify and produce each and every document which you allege substantiates the contentions set forth in your complaint.
6. Identify and produce any and all investigative reports and written or recorded statements, to the extent not done so above, compiled in your prosecution of this lawsuit.
7. Identify and produce all documents which may or will introduce at the trial of this matter.
8. Produce a copy of any and all medical records which may relate to your claims as set forth in your complaint.
9. Produce a copy of your federal and state tax returns for 2003, 2004, 2005 and 2006.

MARSH, COTTER & STEWART, LLP

BY:

  
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R. RAINER COTTER, III (COT010)  
Attorneys for Defendant

OF COUNSEL:

Marsh Cotter & Stewart, LLP  
Post Office Drawer 310910  
Enterprise, Alabama 36331  
(334) 347-2626

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 27<sup>TH</sup> day of July, 2007, I have served a copy of the above and foregoing document upon the following individual by United States mail, postage prepaid, and properly addressed:

J. Victor Price, Esq.  
17 Sistrunk Street  
Tallasse, Alabama 36078

  
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OF COUNSEL